

**UNITED STATES OF AMERICA**

**U.S. DISTRICT COURT**

**CONCORD N.H.**

**JOHNATHON S. IRISH**

**V**

**UNITED STATES OF AMERICA**

**1:16-CV-70-PB**

**U.S. DISTRICT COURT  
DISTRICT OF NH  
FILED  
2016 SEP 12 A 8 18**

**DEFENDANTS REQUEST FOR EXTENSION OF DEADLINE FOR RESPONSE TO GOVERNMENTS  
MEMORANDUM**

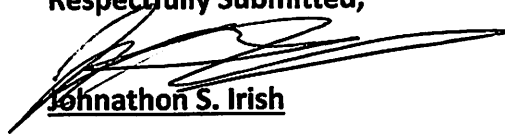
During the evidentiary hearings this court told Mr. Irish that he would have 30 days to respond to the Governments brief and memorandum from the date it was filed. On 16 August, 2016 the United States filed their Memorandum and brief of the evidentiary hearing, making Mr. Irish deadline to respond 16 September, 2016.

As of 04 August, 2016 Mr. Irish started full time employment of 8-12 hours per day 5-6 days per week as well as there has been several emergencies with Mr. Irish's family medical including Mr. Irish hurting his leg at work and having to have multiple appointments, due to Mr. Irish's very busy work schedule and Mr. Irish's family and appointments Mr. Irish has not had the time to complete his response. As of this writing, Mr. Irish has begun his response and is roughly 25% complete, however due to time constraints for work Mr. Irish will not be able to complete the response in time for the 30-day deadline of 16 September, 2016.

Mr. Irish respectfully requests that this court grant a 14-day extension so that Mr. Irish may adequately complete the required research and response to the Governments memorandum.

On Thursday 8 September, 2016 and Friday 9 September 2016 Mr. Irish attempted to make contact with Attorney Aframe for assent to this motion via telephone, Attorney Aframe was not available when Mr. Irish made attempts to reach out and contact Attorney Aframe.

Respectfully Submitted,



Johnathon S. Irish

Pro-Se

12 September, 2016

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served on Seth Aframe of the United States Attorney's Office District of New Hampshire in hand (at address 53 Pleasant St. Concord, New Hampshire, 03301) on this date of **12 September, 2016.**

A handwritten signature in black ink, appearing to read "Johnathon S. Irish", is written over the printed name. The signature is stylized with a large, sweeping loop at the end.

**Johnathon S. Irish**

**Pro-Se**